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**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Business Data Services in an Internet Protocol Environment et al., WC  
Docket Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

On November 8, 2016, Dan McCarthy, CEO of Frontier Communications, spoke via telephone with Chairman Tom Wheeler about the Commission's Business Data Services (BDS) proceeding. Mr. McCarthy described Frontier's experience that the BDS market, including both low and high-bandwidth services, is extremely competitive. Although the draft proposal correctly realizes that high-bandwidth services do not require regulation, Mr. McCarthy explained the ways in which the draft BDS proposal would still unduly affect mid-size ILECs like Frontier that do not have a wireless or significant CLEC presence. The result would be deeply harmful to investment in American broadband connectivity and jobs. To that end, Mr. McCarthy requested that the Commission consider an additional transition period for midsize ILECs as well as a lower rate of reduction. Mr. McCarthy also stated the importance of ensuring that the Commission carefully consider the current state of market competition in how it implements any reform to existing grants of Phase II pricing flexibility, noting the particularly competitive nature of the transport market.

Please contact me with any questions.

Sincerely,

\_\_\_\_/s/\_\_\_\_

Mike Saperstein

cc: Chairman Wheeler  
Stephanie Weiner  
Lisa Hone